



S/019/035

Moab District
Grand Resource Area
885 South Sand Flats Road
Moab, Utah 84532

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UTU-72488 ✓
(UT-068)

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OCT 07 1994

Mr. Don Dallape
Absolute Mining & Minerals, Inc., (AMMI)
1350 East 145 South
Lehi, Utah 84043

Dear Mr. Dallape:

On September 15, 1994, our office received additional information upgrading your Plan of Operations for placer mining operations along the Dolores River in Grand County, Utah. We appreciate the efforts you have taken to date to provide us with information regarding your proposed mining operation. However, our review of this information indicates there are still some areas where we need additional specifics prior to processing your plan. We realize this may cause delay; but, this information is required in order to fully evaluate the environmental impacts and reclamation requirements for your proposed operation.

Your operation would occur along a section of the Dolores River that has been under study for possible inclusion into the Wild and Scenic River System. This necessitates the degree of detail we are requesting prior to authorization, to assure that the operation is well designed and contains adequate measures to mitigate potential impacts resulting from the mining operation.

The following will identify the specific information that you must provide before processing of the Plan can be completed.

General Information

- Do you intend to conduct operations year round or seasonally? If seasonally, please indicate those periods when the operation would be idle. How many years do you propose to operate this mine? What measures will be taken during extended periods of non-operation to maintain the area in a safe and clean manner? Do you plan on occupancy of the area in the event of non-operation?

- Will the operation occur around the clock or for various length shifts? How many days per week do you plan on operating and mining?
- Will the gate currently on the access road remain locked or will it be removed? If it is to remain locked, a key will need to be provided to our office.

Water Usage

We need more specific details on water usage for the operation. Species of Threatened and Endangered fish utilize the Dolores River for habitat. We must assess your operations potential effect on this habitat. Depending on this assessment, we may be required to consult with the U. S. Fish and Wildlife Service (FWS) in accordance with Section 7 of the Endangered Species Act. We must, therefore, have a more accurate description of the overall "water balance" you would propose to establish for your operation. For example, how much will be drawn from the river, how much will be used for processing, and how much will be returned to the river on a daily, monthly and yearly basis?

- The information submitted in your September 15, 1994, letter indicates you may be utilizing water at the rate of 15,000 G.P.M. Is this an accurate figure? Over what time frames would this level of usage occur, i.e., an hour or two per day, all day long, how many days per month?
- Will your water be stored in the holding pond currently on location, or do you intend to store all water in the old abandoned rail tank on location? How many gallons will the pond and storage tank hold respectively? Will you need to expand the storage capacity of the pond, and if so, how large and to what capacity would it be?
- Will the pond be lined to prevent seepage and loss of processing water, or will water be allowed to seep from the pond through the river alluvium, and return to the river system?
- What is the process for transporting the water to the wash plant, i.e., from the river to the holding pond, or directly to the wash plant, or to the storage tank?
- What percent of the total water drawn from the Dolores River will be recycled for use in the wash plant? How much of the water will be returned to the Dolores River? How will the water be returned, by seepage from the holding pond or direct discharge into the river? What measures will be taken to ensure that water returned to the Dolores River will meet State water quality standards?

- Where will pump(s) be placed to intake water from the river? What type of pumps would be utilized, electrical or diesel? What is the pump capacity in GPM's? Will there be screens on the intake for these pumps and what size would they be? How will the pumps be protected from high water in the spring? Will there be a mechanism to prevent seepage of fuels and lubricants from the pumps into the Dolores River alluvium materials?

- What types and sizes of piping would be utilized to transport water from the river to the usage areas? What would the total length be, and will they be placed on the surface or buried?

Access

- The map included with your last submission indicates access will be from the north across the Dolores River. We originally understood that access would be from the south, negating the need for continual access across the Dolores. Will you utilize both access routes, or just one? If access is from across the river, what types of upgrades and/or improvements would be needed to the existing crossing to allow year round access?

- Provide information on any access road upgrade requirements. Will road realignments be required for moving in heavy equipment and processing equipment and supplies? Will culverts need replacing or installation?

- Would you please provide us with a copy of any agreement you may have with the Grand County Road Department?

Fuel Requirements

- What type of power source will be utilized for running the wash plant and any other processing equipment? If diesel, what are the fuel requirements on a daily basis? Where will the diesel be stored, in the existing tanks on location or in new tanks? If utilizing the current tanks, will the tanks be tested for leakage prior to use? What procedures would be utilized to upgrade these tanks so that spillage and/or leakage will not reach the Dolores River system, either through direct overland flow in the event of tank failure, or seepage through alluvium? Would the tanks be placed within a berm and/or lined area?

- What are the overall fuel requirements for all equipment on location on a daily basis? How much and what types of fuel would be stored on location at a given time?

- What are the quantity requirements for lubricant usage with this operation? Where would lubricants be stored and how would they be disposed of?

Mining and Reclamation Operation

We need a more detailed map of the projected mining and reclamation areas, and a more detailed explanation of how mining and reclamation will progress from area to area. We note that there are several different types of terrain on the project lands due to past mining operations. There are pits which appear to be exhausted of placer material, there are piles of oversize reject gravel materials, there are piles of gravel that have either been processed or are awaiting processing, and there are soil stockpiles. Please provide the following information:

- A detailed and accurate map depicting the location of the features referred to above. Indicate previously disturbed areas that will be mined and undisturbed areas that will be mined. Also, show locations of pumps, pipelines, wash plant, stockpile areas, camp, shop areas, structures, fuel storage areas, and water storage areas.
- Provide a narrative discussion of where mining will occur and the direction and areas to which mining will progress. Provide acreage estimates of surface disturbance and reclamation that will occur annually.
- What is the capacity in cubic yards per day that the wash plant can process? Estimate how many yards of material will be mined per month and how many yards will be processed.
- Is the mining sequence based on sampling of the gravels? Although not a requirement of plan approval, if sample data exist, we would request copies of this information. We will hold this information as confidential at your request.
- Will reclamation occur only on those areas disturbed by your operations, or will reclamation occur on any of the previously disturbed areas?
- Your proposed mining operation involves an area which has an existing approved Plan of Operation. Development and surface disturbance has occurred under this plan which has not been reclaimed. The area currently contains structures, equipment and facilities, trash, stockpiled topsoils and gravels, tailings ponds, and pit mine areas. Your proposed Plan of Operation must address all previous surface disturbance which will be involved in your proposed operation, and whether AMMI is accepting responsibility for reclaiming these areas, dismantling structures, and removing trash and abandoned equipment.
- Do you plan on re-vegetating reclaimed areas, and if so, with what types of plant species and in what quantities?
- Where will you dispose of abandoned vehicles, junk and the dismantled building when operations cease?

When we have received this information we will begin processing the Environmental Assessment (EA) for your proposal, and develop any mitigation requirements necessary to assure there is no undue and unnecessary degradation of the public lands. We would envision public interest in the proposal and will provide for a public comment period as necessary. As mentioned earlier, based on the final information provided and the impact assessment identified in the EA, we may need to consult with the FWS for possible impact mitigation to Threatened and Endangered species in the Dolores River.

Bond coverage will also be required for this proposed operation prior to BLM approval of any surface disturbing activities. The bond will be based on the calculated costs of the reclamation plan for the area. Therefore, please make your reclamation plan detailed enough that we can make an accurate estimate of reclamation costs.

We thank you for your cooperation in this effort to provide a complete Plan of Operation for your proposal, such that impacts and mitigation can be accurately assessed prior to authorization. If you have any questions on the foregoing, please contact Sal Venticinque, at (801) 259-8193 for information.

Sincerely,

/s/ BRAD D. PALMER

Area Manager

cc: UT-060, District Manager, Moab District

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UTU-72488

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